

REMARKS

This is a timely response to the Official Action mailed December 3, 2007. Applicant wishes to thank the Examiner for the thorough search and analysis of the prior art.

Applicant noted an error in the claim numbering in the Preliminary Amendment which the Examiner kindly corrected when issuing the Official Action. To avoid any subsequent errors, Applicant has cancelled all pending claims and resubmitted the claims with new numbering. In addition, the letter "C" in the word "claims" has been capitalized for consistency, and in some claims the word "claims" has been replaced by "Claim" for grammatical correctness.

The sole independent claim has been rejected based upon the DAY document (WO 2004/009349) considered with the GIRON et al document (US 2004-0053125). For the reasons set forth below, the rejection is respectfully traversed.

1. The Official Action correctly notes that the DAY document fails to disclose that each area (i.e., the conductive layer being divided into at least 2 distinct areas) being bound to an electrode.

2. However, Applicant respectfully submits that there are other differences between the independent claim (as originally presented and as presented in the Preliminary Amendment) when compared to a proper interpretation of the DAY document.

a) In the DAY document, a connecting circuit in the form of a flexible circuit board is not "formed from at least one conductive layer deposited on one face of the glass sheets or of the thermoplastic layers" as set forth in the independent claim. Rather, this flexible circuit board is inserted between the upper glass ply 5 and the PVB ply 7 and the lower glass ply 6.

b) In the DAY document, as the Official Action notes, the flexible circuit board is not disclosed as being "divided into at least 2 distinct areas" as set forth in the independent claim. Rather, the circuit board 3 has a single area potentially capable of being bound to electrodes. That single area is the narrow area 9 (referred to in the DAY document at page 6, lines 27-30 as a conductive pathway 9"). It is not referred to as multiple pathways. The configuration of this pathway is in the shape of a narrow (top to bottom), wide (left to right) reverse letter "C" with enlarged ends (reference numeral 8) both of which are for the same pathway.

3. The GIRON document, as interpreted in the Official Action, does not render the claim obvious. The Official Action refers to paragraphs 17 and 80 for the proposition that "the

electrodes can be in the form of two semiconductive layers on each side the layer or various active layers of a system." This also is respectfully traversed.

a) In the GIRON document, the connecting circuit is formed from one lower conductive layer 2 and one upper conductive layer between which is an active stack 3 (see, paragraph 0080) and each of which is in contact with a current lead (see paragraph 0020). Contrary to this disclosure, the independent claim refers to the "conductive layer being divided into at least 2 distinct areas".

b) Similarly, in the GIRON document, there are not "2 distinct areas each being bound to an electrode".

4. In addition to the foregoing feature being absent from both the DAY and GIRON documents, it is submitted that even combining the teachings of these two documents, assuming that there was a non-hindsight basis to do so, would not arrive at the independent claim.

a) The connecting circuit of the electromechanical device of the GIRON document, which is constituted by two superposed conductive layers, each being connected to a current lead, and between which is inserted the active layer, could not be applied in the panel of the DAY document because in the DAY document the connecting circuit is an independent flat flexible circuit on which the conductive pathway 9 is in a single plane (contrary to a stack) upon which the active layer (LED 2) is fixed.

b) Furthermore, even if such a combination were reasonable, expected and feasible without substantial reworking of the teachings of one or both prior art documents, such combination still would not correspond to the independent claim as noted above.

CONCLUSION

For each of the foregoing reasons, reconsideration and allowance are solicited. The dependent claims are submitted to be separately patentable since each dependent claim adds to the independent claim. Furthermore, since Applicant has not substantively amended the claims, it is submitted that any subsequent rejection should not be a "final rejection".

Should the Examiner be of the opinion that further clarification would put this application in condition for allowance, the Examiner is encouraged and requested to contact Applicant's attorney at the telephone number given below.

Respectfully submitted,

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